

REMARKSClaim Status

Claims 1-6 and 8 are pending in the present application. Claims 7 and 9-15 are canceled without prejudice and merely to simplify issues for this Amendment. Restricted claims 9-15 will be presented in one or more continuing applications. Applicant also reserves the right to prosecute claim 7 - or a version thereof - in one or more continuing applications.

The primary purpose of this Amendment is to clarify -- for a final time -- applicant's position regarding the Office's now-familiar rejections. These clarifications pave the path for an appeal.

Claims 1-6 stand rejected as being anticipated by U.S. Patent No. 6,504,571 (Narayanaswami). Claim 8 stands rejected as being unpatentable over Narayanaswami in view of U.S. Patent No. 6,504,571 (Wang).

Applicant respectfully traverses these rejections.

Claim 1 in view of Narayanaswami

The office correctly suggests that col. 8, lines 6-19, discloses placing parameters into every "captured image" (see col. 8, lines 6-16, discussing camera 100). This col. 8 passage corresponds to Narayanaswami's FIG. 1, which "is a block diagram of an image capturing system for generating digital images having a plurality of recorded parameters" (emphasis added) (see col. 4, lines 49-52). Camera 100 includes a watermark processor 134 by which every captured image is watermarked (see FIG. 1; see also col. 8, lines 6-8). Images are watermarked after image capture.

The Office then refers to an image annotation module 220 as presumably teaching a second watermarking step. Applicant initially notes that Narayanaswami does not specifically say whether annotation module 220 includes watermarking. In fact, we remain suspicious as to whether the annotation module 220 does -- in fact -- include watermarking. Nevertheless, even assuming that the annotation module 220 includes

watermarking – only for sake of argument – the teaching is still deficient. Let's take another look at the claim 1 structure.

Claim 1 recites watermarking image data, and then watermarking a map generated from a database including the watermarked image data.

In contrast, Narayanaswami's FIG. 2 and related discussion suggest annotating "images," but not after map generation (as likely occurs with blocks 206-214 and 218). While the annotation module may map to claim 1's first watermarking step, it is an unreasonable stretch to map it to claim 1's second, post map generation, watermarking step.

Respectfully, claim 1 should be allowed.

Claim 2 in view of Narayanaswami

Again, while Narayanaswami may watermark imagery (see, e.g., Col. 8, lines 6-21 and FIG. 1, item 134) it is not understood to teach or suggest generating a digital map, and then watermarking the map.

Respectfully, claim 2 should be allowed. (Other shortcomings of the art need not be belabored herein.).

Claim 8 in view of Narayanaswami and Wang

Applicant agrees with the Office that Narayanaswami does not teach or suggest a composite map formed from plural set of component map data, with each component including a different watermark, and with each of the different watermarks encoding or linking to metadata associated with its respective component map data (see the Office Action at page 10, lines 10-13). The Office turns to Wang to meet Narayanaswami's deficiencies.

Wang is cited, at Col. 4, lines 4-11, as providing for Narayanaswami's deficiencies. Applicant respectfully disagrees. The cited passage is not understood to teach or suggest that each component includes a different watermark (e.g., Wang's FIG. 1 appears to place the same "X" in the image) in each component. And, there is no mention at the cited Wang passages that each of the different watermarks encodes or link to metadata associated with its respective component map data. (The passing citation to

Col. 5, line 9 is not persuasive since it merely states a watermark can be embedded into received images – and not a different watermark per each image component.).

Claim 8 should be allowed.

Dependent Claims

The dependent claims are also believed to recite patentable combinations.

Favorable consideration is requested.

Conclusion

The application is believed to be in condition for allowance. An early notice of allowance is respectfully requested. (The remaining shortcomings of the art need not be belabored at this time.).

Nevertheless, the Examiner is invited to telephone the undersigned at 503-495-4575 if any issue remains.

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Respectfully submitted,

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